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From:LEWIS BRISBOIS BISGAARD & SMITH LLP

T-086 P.004/006 F-001

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6 AND CASUALTY INSURANCE COMPANY

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA (San Francisco)

11 CHRISTINE DOUGHERTY,

12 Plaintiff,

14 v.

15 AMCO INSURANCE COMPANY, and DOES
16 ONE through TWENTY, Inclusive,

17 Defendant.

) CASE NO. C 07-01140 MHP
) E-FILING

) **STIPULATION AND PROPOSED ORDER**
) **RE EXTENDING DEADLINE FOR**
) **COMPLETING LIMITED DISCOVERY**
) **PRIOR TO MOTION FOR SUMMARY**
) **JUDGMENT**

) Action Filed: 1/24/07
) Removed to USDC: 2/26/07

21 Plaintiff CHRISTINE DOUGHERTY and Defendant AMCO INSURANCE COMPANY,
22 by and through their undersigned counsel, hereby jointly stipulate to and request the Court agree to
23 continue the deadlines for completion of discovery for the purpose of motions for summary
24 judgment and for filing motions for summary judgment.

25 The parties attended a Status Conference on November 5, 2007, and the Court
26 subsequently issued a Minute Order. On January 24, 2008, this Court issued an Order
27 memorializing its Minute Order, as follows:

28 ///

4813-2082-5794.1

CERTIFICATE OF SERVICE
C07-01140 MHP

1 • Last Day for Completion of Discovery for the
2 Purpose of Motions for Summary Judgment

February 4, 2008

3 • Last Day to File Motions for Summary Judgment

March 10, 2008

4 (See Court's Order dated January 24, 2008, attached hereto as Exhibit "A.").

5 Pursuant to the Court's Minute Order, on January 4, 2008 Plaintiff served on AMCO by
6 mail a notice of taking deposition of AMCO's person most knowledgeable on nine different
7 topics. AMCO's counsel has attempted to locate and identify the witnesses who qualify as the
8 person most knowledgeable on these topics, including those related to the Colossus program, but
9 has experienced some difficulty in locating all of the witnesses to produce for deposition. Part of
10 the delay has been caused by the circumstance that AMCO and its related companies stopped
11 using the Colossus program in August of 2005, and thus locating any related documents and
12 identifying the individuals still employed by AMCO who have significant knowledge of the
13 Colossus program has been difficult and has taken longer than anticipated.

14 That search was just recently completed and the witness with regard to the Colossus
15 program who was identified is located out of state. AMCO expects to be in a position to produce
16 for deposition that witness, as well as the witnesses responsive to the other identified topics, in the
17 next three weeks.

18 Therefore, given the efforts of AMCO to identify and locate the witnesses appropriate to
19 produce in response to Plaintiff's notice of taking deposition, and the delay in completing that
20 effort until recently, the parties jointly stipulate and request the Court to continue the deadlines for
21 completion of discovery for the purpose of motions for summary judgment and for filing motions
22 for summary judgment.

23 Therefore, the parties agree and stipulate to the following, subject to the Court's approval:

24 1. The deadlines for completion of discovery for the purpose of motions for summary
25 judgment and for filing motions for summary judgment, as set forth in this Court's Order dated
26 January 24, 2008, is vacated.

27 2. The deadline for completion of discovery for the purpose of motions for summary
28 judgment is set for March 10, 2008.

3. The deadline for filing motions for summary judgment is set for March 24, 2008.

Respectfully submitted,

DATED: February 13, 2008

LAW OFFICES OF STEPHEN M. MURPHY

By

STEPHEN M. MURPHY
JEREMY A. GRAHAM
Attorneys for Plaintiff
CHRISTINE DOUGHERTY

DATED: February 28, 2008

LEWIS BRISBOIS BISGAARD & SMITH LLP

By

JULIAN J. PARDINI
Attorneys for Defendant
AMCO INSURANCE COMPANY

ORDER

Pursuant to the above stipulated request of the parties for an order continuing certain discovery deadlines,

IT IS HEREBY ORDERED that:

1. The deadlines for completion of discovery for the purpose of motions for summary judgment and for filing motions for summary judgment, as set forth in this Court's Order dated January 24, 2008, is vacated.

2. The deadline for completion of discovery for the purpose of motions for summary judgment is set for March 10, 2008.

3. The deadline for filing motions for summary judgment is set for March 24, 2008.

DATED: February 26, 2008

HONORABLE
UNITED STATES



4813-2982-5794.1

CERTIFICATE OF SERVICE
C07-01140 MHP

3. The deadline for filing motions for summary judgment is set for March 24, 2008.

Respectfully submitted,

DATED: February __, 2008

LAW OFFICES OF STEPHEN M. MURPHY

By

STEPHEN M. MURPHY
JEREMY A. GRAHAM
Attorneys for Plaintiff
CHRISTINE DOUGHERTY

DATED: February 11, 2008

LEWIS BRISBOIS BISGAARD & SMITH LLP

By


JULIAN J. PARDINI
Attorneys for Defendant
AMCO INSURANCE COMPANY

ORDER

Pursuant to the above stipulated request of the parties for an order continuing certain discovery deadlines,

IT IS HEREBY ORDERED that:

1. The deadlines for completion of discovery for the purpose of motions for summary judgment and for filing motions for summary judgment, as set forth in this Court's Order dated January 24, 2008, is vacated.

2. The deadline for completion of discovery for the purpose of motions for summary judgment is set for March 10, 2008.

3. The deadline for filing motions for summary judgment is set for March 24, 2008.

DATED: February __, 2008

HONORABLE MARILYN H. PATEL
UNITED STATES DISTRICT COURT JUDGE